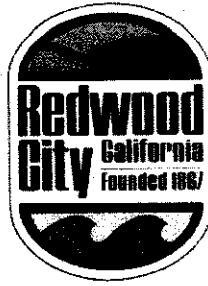


PUBLIC WORKS SERVICES DEPARTMENT
Water Utilities Services Division

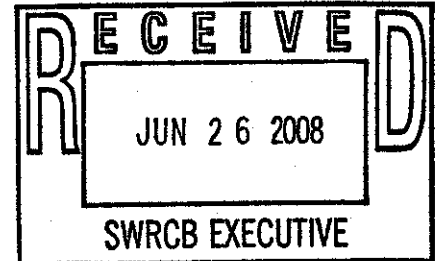


Public Workshop
Landscape Irrigation
Deadline: 6/26/08 by 12 p.m.

MUNICIPAL SERVICES CENTER
1400 Broadway
Redwood City, CA 94063-2505
Phone: (650) 780-7464
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June 26, 2008

Jeanine Townsend, Clear to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



SUBJECT: LANDSCAPE IRRIGATION GENERAL PERMIT

Dear Chair Doduc and Members of the Board:

Redwood City is an active member of the California Section of the WaterReuse Association and we are in full support of the Association's comments regarding the *Landscape Irrigation General Permit* which are provided under separate cover. In addition, we would like to emphasize the following three points:


1. The State Water Board should permit recycled water uses that are consistent with the Water Recycling Criteria found in Title 22 of the California Code. California Department of Public Health is the primary state agency responsible for the protection of public health and the regulation of drinking water. A general permit that incorporates the requirements listed in Title 22 will avoid the concerns listed in the *Project Discussion Paper* that was attached to the June 18 workshop notice.
2. The General Permit should support the State's legislative policy to undertake all possible steps to encourage the development of water recycling facilities so that recycled water may be made available to help meet the growing requirements of the state. In developing the General Permit, the SWRCB should work to avoid an overly restrictive permit that could discourage recycling water use.
3. The General Permit should be consistent with the intention behind AB 1481 to develop a uniform interpretation of state standards and to expedite the permitting process for landscape irrigation.

Redwood City's recycled water system is currently permitted under the San Francisco Bay Region's Order 96-011, General Water Reuse Requirements. Our experience under this general order has been positive and we recommend the State Board look to Order 96-011 as a model for their General Permit.

We appreciate the State Water Board's leadership in developing a statewide general permit to facilitate water reuse and to bring greater consistency to recycled water regulations and the permitting process. Water recycling is an important component of California's future water supply.

Thank you for your consideration.

Sincerely,


JUSTIN EZELL
Public Works Superintendent